CLERK OF THE 1 Alexander (Zander) Blewett, III DISTRICT COURD HOYT & BLEWETT PLLC KRISTIE LEE BOOLTER P.O. Box 2807 2 Great Falls, MT 59403-2807 2014 AUG Phone: (406)761-1960 3 Fax: (406)761-7186 FILED 4 Attorneys for Plaintiff 5 6 7 8 MONTANA THIRTEENTH JUDICIAL DISTRICT COURT, YELLOWSTONE COUNTY 9 10 JASON T. TALBOT, Cause No. 11 Plaintiff, MARY JANE KNISELY 12 13 JONATHAN NIKOLAUS TOKARSKI, COMPLAINT AND DEMAND and WMK-DAVIS, LLC. FOR JURY TRIAL 14 Defendants. 15 16 COMES NOW the above-named Plaintiff and complains and alleges as follows: 17 Plaintiff, Jason T. Talbot, is a citizen and resident of Willow, Oklahoma, who was 1. 18 working in Billings, Montana, on March 18, 2014. 19 2. Defendant, Jonathan Nikolaus Tokarski, was at all times acting within the course 20 and scope of his employement with WMK-Davis, LLC, when he negligently operated a motor 21 vehicle on First Avenue North and North Broadway in Billings, Montana, County of 22 Yellowstone, and caused severe personal injuries to Plaintiff. 23 3. Jonathan Nikolaus Tokarski is a citizen of the State of Montana. 24 4. Defendant WMK-Davis, LLC, at all times pertinent herein, was the employer of 25 Jonathan Nikolaus Tokarski, and WMK-Davis, LLC, is liable for the negligence of Jonathan 26 Nikolaus Tokarski. 27 28



I	5. Jonathan Nikolaus Tokarski and WMK-Davis, LLC, are jointly and severely liable				
2	for all damages suffered by Jason T. Talbot, the full extent of which will be proven at the time of				
3	trial.				
4	WHEREFORE, Plaintiff, Jason T. Talbot, prays for judgment against Jonathan Nikolaus				
5	Tokarski and WMK-Davis, LLC, jointly and severally for all damages allowable under Montana				
6	law, for his costs and disbursements incurred herein and for such further relief as the Court				
7	deems just under the circumstances.				
8	DATED this <u>29</u> day of July, 2014.				
9	HOYT & BLEWETT PLLC				
10					
11	By Mo and Blenett To				
12	Alexander (Zander) Blewett, III				
13	P.O. Box 2807 Great Falls, MT 59403-2807				
14	Attorneys for Plaintiff				
15	DYDKA AND EICHD TYTONAUTOTA T				
16	DEMAND FOR JURY TRIAL				
17	Plaintiff demands a trial by jury in the above-entitled action.				
18	DATED this 29 day of July, 2014.				
19	HOYT & BLEWETT PLLC				
20	α .				
21	By: Uxund Slevett To				
22	By: Con Sewell Try Alexander (Zander) Blewett, III P.O. Box 2807				
23	Great Falls, MT 59403-2807				
24	Attorneys for Plaintiff				
25					
26					

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Date: 8/15/2014

Yellowstone County District Court

Time: 02:18 PM Page 1 of 1 Case Register Report DV-56-2014-0001113-DE

Jason T Talbot vs. Jonathan Nikolaus Tokarski, etal.

Filed:

8/6/2014

Subtype:

Debt

Status History

Open

8/6/2014

Plaintiffs

Pl. no. 1

Attorneys

Blewett, Alexander

(Primary attorney)

Send Notices

User: RSCHIERHOL

Defendants

Def. no. 1

Tokarski, Jonathan Nikolaus

Def. no. 2

WMK-Davis, LLC

Talbot, Jason T

Judge History

Date

Judge

Reason for Removal

8/6/2014

Knisely, Mary Jane

Current

Register of Actions

Doc. Seq.	Entered	Filed	Text	Judge
1.000	08/07/2014	08/06/2014	Complaint and Demand for Jury Trial	Knisely, Mary Jane
2.000	08/07/2014	08/06/2014	Summons Issued: Jonathan Nikolaus Tokarski	Knisely, Mary Jane
3.000	08/07/2014	08/06/2014	Summons Issued: WMK-Davis, LLC	Knisely, Mary Jane